



January 22, 2025

Mr. Steven K. Bonnell II  
1504 Bay Road, Apt. 2012  
Miami Beach, FL 33139  
*via Hand Delivery and*  
*email: [contact@destiny.gg](mailto:contact@destiny.gg)*

**RE: Demand for Preservation of Evidence**  
**In the Matter of [REDACTED] v. Steven Bonnell**

Dear Mr. Bonnell:

I write as counsel for my client, Ms. [REDACTED] to advise you of a claim of damages and other relief against you, and/or any entity in which you may have an interest, arising out of the above-captioned matter (hereinafter this "matter"). Commencing in or about January 2022, intimate images/videos of Ms. [REDACTED] were unlawfully disclosed and/or distributed without her knowledge or consent. These images/videos have been disseminated on social media platforms, websites and other online channels and have caused significant harm to Ms. [REDACTED] privacy, dignity and well-being. You are hereby advised of your legal obligation to preserve, maintain, prevent spoliation of, and not destroy any evidence which in any way relates to this matter.

Specifically, you must ensure the preservation of the following evidence and avoid its spoliation in any way, shape or form:

1. Electronically Stored Information ("ESI"): Any and all communications, including but not limited to emails, text messages, direct messages, or other forms of electronic communication, containing the intimate images/videos or references to them, or in any way related to the matter, or between you and Ms. [REDACTED] and/or about Ms. [REDACTED]
2. Website Data: Any evidence related to the posting of the intimate images/videos on websites, forums, or blogs, including IP addresses, usernames, metadata, and logs of users who have accessed, downloaded, or shared the images/videos.
3. Images and Videos: Any and all intimate images, videos, or recordings in your possession, whether stored on digital platforms, devices, or in any other format.
4. Metadata: Associated metadata for any images/videos, including timestamps, file origins, device details, IP addresses from which the images/videos were uploaded or shared, and any other identifying or tracking data.
5. Storage Media: Any physical or digital media (e.g., hard drives, cloud storage, backup files, etc.) that may contain relevant copies of the intimate images, videos or any associated communications.

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v. Steven Bonnell

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6. Third-Party Information: Any evidence or information regarding third-party individuals or entities who may have been involved in the dissemination of the images or videos or who have interacted with the material in any way.
7. Statements: Any recorded or written statements you gave to anyone concerning the matter; and any recorded or written statements you received from anyone concerning the matter.

You must immediately take all necessary measures to preserve the above-listed evidence in its current form, including ensuring that no data is modified, overwritten, or deleted. With respect to ESI, adequate preservation of ESI requires more than simply refraining from efforts to delete, destroy or dispose of such evidence. You must intervene to prevent loss due to routine operations or active deletion by employing proper techniques and protocols to preserve ESI. *Many routine activities serve to irretrievably alter evidence and constitute unlawful spoliation of evidence.* You are directed to immediately initiate a litigation hold for potentially relevant ESI, documents and tangible things and to act diligently and in good faith to secure and audit compliance with such litigation hold. You are further directed to immediately identify and modify or suspend features of your information systems and devices that, in routine operation, operate to cause the loss of potentially relevant ESI.

Nothing in this demand for preservation should be read to limit or diminish your concurrent common law and statutory obligations to preserve documents, tangible things and other potentially relevant evidence.

Thank you for your full cooperation and prompt attention in ensuring no spoliation of evidence occurs concerning documents or intangible evidence related to this incident. If you have any questions, please contact my office.

Very truly yours,



Carlos A. Garcia Perez



## Angie Velando

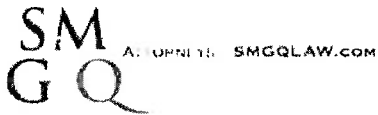
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**From:** Angie Velando  
**Sent:** Thursday, January 23, 2025 2:59 PM  
**To:** contact@destiny.gg  
**Cc:** Carlos Garcia Perez  
**Subject:** Demand for Preservation of Evidence - In the Matter of v. Steven Bonnell  
**Attachments:** Lt Preserve - 1-23-2025.pdf

Attached please find a letter from attorney Carlos A. Carcia Perez regarding claim for damages against Steven K. Bonnell II.

Please govern yourself accordingly.

ANGIE VELANDO, FRP  
Assistant



GONCHEZ MEDINA, GONZALEZ, QUESADA,  
LAGO, GOMEZ & MACHADO LLP

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[angie@smgqlaw.com](mailto:angie@smgqlaw.com) | [SMGQLAW.com](http://SMGQLAW.com)



January 24, 2025

Mr. Steven K. Bonnell II  
1504 Bay Road, Apt. 2012  
Miami Beach, FL 33139  
*via Hand Delivery and*  
*email: [contact@destiny.gg](mailto:contact@destiny.gg)*

**RE: DEMAND TO CEASE AND DESIST**  
**In the Matter of \_\_\_\_\_ v. Steven Bonnell**

Dear Mr. Bonnell:

I am writing to formally demand that you immediately cease and desist from the unauthorized dissemination, sharing, or distribution of intimate images and/or videos involving my client Ms. \_\_\_\_\_. These images, which were taken and or shared without her consent, have caused Ms. \_\_\_\_\_ severe emotional distress and are in direct violation of her legal rights. Specifically, your actions are not only harmful but illegal under applicable laws regarding privacy, consent and image protection. The unauthorized disclosure of intimate images is a violation of Ms. \_\_\_\_\_ rights under 15 USC § 6851, *inter alia*, and may expose you to civil liability. Therefore, I demand the following: i) the immediate removal of any and all intimate images involving Ms. \_\_\_\_\_ from any and all platforms, websites, social media or any other places where they have been shared or distributed by you; ii) the immediate cessation of the dissemination, sharing, or distribution of intimate images and/or videos involving Ms. \_\_\_\_\_; and iii) written confirmation of your compliance with these demands within five business days from the date of this letter.

Failure to comply with this Cease and Desist notice will result in immediate and appropriate legal action, including but not limited to a civil suit for damages and equitable relief to force you to perform the foregoing, to hold you liable for all damages, and to hold you responsible for all of Ms. \_\_\_\_\_ costs, expenses, and attorneys fees resulting from your improper and illegal acts. This letter is written without prejudice to, and/or waiver of, all of Ms. \_\_\_\_\_ rights, remedies, claims for damages, at law and in equity, all of which are expressly reserved and preserved.

PLEASE GOVERN YOURSELF ACCORDINGLY.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Carlos A. Garcia Perez', written in a cursive style.

Carlos A. Garcia Perez

CGP rec'd

CUSTOMER RECEIPT

E

**EXECUTIVE**  
MESSENGER SERVICE

executivemessengerservice.com

01/27/25

Date

Job No.

SANCHEZ MEDINA

Contractor

201 XLP C.

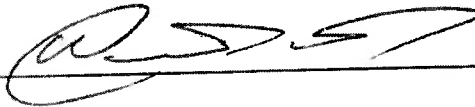
# 1205

Pick-Up Address

1504 BAY RD

Delivery Address

Contractor Signature



Dade

(305) 373-3443

Thank You

Limit of liability \$50.00 subject to conditions on the reverse side.

## Angie Velando

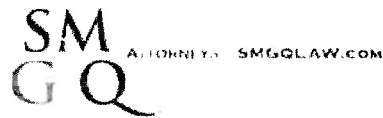
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**From:** Angie Velando  
**Sent:** Friday, January 24, 2025 11:24 AM  
**To:** contact@destiny.gg  
**Cc:** Carlos Garcia Perez  
**Subject:** Demand to Cease and Desist - In the Matter of v. Steven Bonnell  
**Attachments:** Lt Cease and Desist 1-24-2025.pdf

Attached please find a letter from attorney Carlos A. Carcia Perez regarding claim for damages against Steven K. Bonnell II.

Please govern yourself accordingly.

ANGIE VELANDO, FRP  
Assistant



GARCIA MEDINA, GONZALEZ, QUE SALDA,  
FAGEL, DOMESTIC, MACHADO & LLP

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